

## **EXHIBIT 2**

**In re MOTORS LIQUIDATION COMPANY, et al.,**  
**f/k/a General Motors Corp., et al., No. 09-50026**

**GUC Trust and New GM's Affirmative Designations of the Deposition Testimony of James Barton and the Plaintiffs and Participating Unitholders' Objections Thereto**

<b>James Barton November 22, 2017</b>		
<b>GUC Trust and New GM's Affirmative Designations</b>		<b>Plaintiffs and Participating Unitholders' Objections</b>
<b>Designation Begin</b>	<b>Designation End</b>	
18:15	18:16	106 (completeness/ fairness requires introduction of other portions of testimony which ought in fairness be considered contemporaneously); 401-403 (irrelevant to phase 1 issues, and any minimal relevance is outweighed by risks of confusion of the issues/ waste of time); 601, 602 (lacks foundation).
18:24	19:7	106 (completeness/ fairness requires introduction of other portions of testimony which ought in fairness be considered contemporaneously); 401-403 (irrelevant to phase 1 issues, and any minimal relevance is outweighed by risks of confusion of the issues/ waste of time); 601, 602 (lacks foundation).
21:8	21:17	
22:9	22:14	
39:7	39:12	106 (completeness/ fairness requires introduction of other portions of testimony which ought in fairness be considered contemporaneously); 401-403 (irrelevant to phase 1 issues, and any minimal relevance is outweighed by risks of confusion of the issues/ waste of time).

**Plaintiffs and Participating Unitholders' Affirmative Designations of the Deposition Testimony of James Barton and the GUC Trust and New GM's Objections Thereto**

<b>James Barton November 22, 2017</b>
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Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM's Objections
Designation Begin	Designation End	
6:20	6:24	
7:7	7:8	
7:25	8:6	
10:4	10:8	
10:15	11:4	
12:14	12:14	
12:21	12:23	
13:8	14:13	
14:15	15:4	
16:11	16:17	
17:18	17:19	
21:8	22:17	
23:11	23:19	
24:18	24:21	
31:2	31:4	
31:7	31:15	
34:12	34:15	
35:21	36:6	
36:22	36:24	
37:10	37:12	
37:21	38:7	

**GUC Trust and New GM's Counter-Designations of the Deposition Testimony of James Barton and the Plaintiffs and Participating Unitholders' Objections Thereto**

James Barton November 22, 2017		
GUC Trust and New GM's Counter-Designations		Plaintiffs and Participating Unitholders' Objections
Counter-Designation Begin	Counter-Designation End	
19:23	20:2	Not a valid counter-designation for completeness or fairness purposes (106), Relevance (401)
20:5	20:5	Not a valid counter-designation for completeness or fairness purposes

James Barton November 22, 2017		
GUC Trust and New GM's Counter-Designations		Plaintiffs and Participating Unitholders' Objections
Counter-Designation Begin	Counter-Designation End	
		(106), Relevance (401)
20:9	20:10	Not a valid counter-designation for completeness or fairness purposes (106), Relevance (401)
20:12	20:14	Not a valid counter-designation for completeness or fairness purposes (106), Relevance (401)
21:4	21:7	Not a valid counter-designation for completeness or fairness purposes (106), Relevance (401)
23:20	24:1	Not a valid counter-designation for completeness or fairness purposes (106), Relevance (401)
24:12	24:17	Not a valid counter-designation for completeness or fairness purposes (106), Relevance (401)
32:22	33:9	Not a valid counter-designation for completeness or fairness purposes (106), argumentative, asked and answered, improper designation of record objection, which is irrelevant (401-403).
33:13	33:20	Not a valid counter-designation for completeness or fairness purposes (106), argumentative, asked and answered, improper designation of record objection, which is irrelevant (401-403).

**Plaintiffs and Participating Unitholders' Counter-Designations of the Deposition Testimony of James Barton and the GUC Trust and New GM's Objections Thereto**

James Barton November 22, 2017	
Plaintiffs and Participating Unitholders' Counter-Designations	GUC Trust and New GM Objections to Counter-

Counter-Designation Begin	Counter-Designation End	Designations
7:7	7:8	
8:4	8:6	
21:18	22:1	
24:18	24:21	
34:12	34:15	
36:17	36:24	
38:2	38:7	